

## REMARKS

The Office Action dated May 20, 2004, has been received and carefully noted.

The following remarks are submitted as a full and complete response thereto.

Claims 7-13 have been withdrawn. Accordingly, claims 1-6 are pending in the present application and respectfully submitted for consideration.

### Claims 1-6 Recite Patentable Subject Matter

Claims 1-6 were rejected under 35 U.S.C. § 102(e) as being anticipated by Ono et al. (U.S. Patent No. 6,314,137, hereinafter "Ono"). Applicants respectfully traverse the rejection.

Claims 1 and 3 recite an image recording apparatus and an image recording/reproducing apparatus, respectively having, among other features, means for finding, with respect to each of the input image data corresponding to the fields between the field corresponding to the input image data which has been stored in the memory and the field corresponding to the input image data which is to be subsequently stored in the memory, the difference between the input image data and the basic image data which has been most newly stored in the memory, and feeding data representing the obtained difference to the image compression means.

Claims 4 and 6 recite an image recording apparatus for recording on a recording medium and an image recording/reproducing apparatus comprising a recording apparatus for recording on a recording medium, respectively having, among other features, means for finding, in each group of fields assigned the same camera number which are included in the same camera number which are included in the time division multiplex image signal, the difference between each of the image data corresponding to

the fields between the field corresponding to the image data which has been stored in the storage means corresponding to the camera number assigned to the group of fields and the field corresponding to the image data which is to be subsequently stored in the corresponding storage means and the basic image data which has been most newly stored in the corresponding storage means, and feeding data representing the obtained difference to the image compression means.

Applicants respectfully submit that Ono fails to teach or suggest at least the foregoing features.

FIG. 9 of Ono discloses a MPEG encoding circuit 11. Moreover, Ono discloses a picture reordering circuit 71, a subtracter 72, switching circuits 73, 83, a DCT (Discrete Cosine Transform) circuit 74, a quantization circuit 75, a variable-length encoding circuit 76, a buffer memory 77, an inverse-quantization circuit 78, an inverse DCT circuit 79, an addition circuit 80, an image memory 81, a motion compensation circuit 82, a picture type decision circuit 84, a rate control circuit 85, a camera code generation circuit 86, and a video multiplexer 87.

The MPEG encoding circuit of Ono performs encoding on three types of pictures repeatedly: Intra-frame encoding I (Intra-coded) picture, forward inter-frame predictive encoding P (Predictive-coded) picture, and bi-directionally inter-frame predictive encoding B (Bi-directionally predictive-coded) picture.

The Office Action characterizes Ono as allegedly disclosing the present invention in Figure 1 and 9-11, column 24, lines 24-45; column 12, lines 57-68; columns 13, 14; and column 5, line 60 to column 6, line 5. In particular, the Office Action merely highlights column 13 as allegedly showing the aforementioned claim limitations.

Applicants respectfully disagree with the Office Action's characterization of Ono since Ono simply fails to disclose or suggest at least the feature of a "means for finding, with respect to each of the input image data corresponding to the fields between the field corresponding to the input image data which has been stored in the memory and the field corresponding to the input image data which is to be subsequently stored in the memory, the difference between the input image data and the basic image data which has been most newly stored in the memory, and feeding data representing the obtained difference to the image compression means," with respect to claims 1 and 3, and at least the feature of a "means for finding, in each group of fields assigned the same camera number which are included in the same camera number which are included in the time division multiplex image signal, the difference between each of the image data corresponding to the fields between the field corresponding to the image data which has been stored in the storage means corresponding to the camera number assigned to the group of fields and the field corresponding to the image data which is to be subsequently stored in the corresponding storage means and the basic image data which has been most newly stored in the corresponding storage means, and feeding data representing the obtained difference to the image compression means," with respect to claims 4 and 6.

For instance, Ono relates to MPEG, where P data is generated from data after being compressed. In contrast, the present invention determines the difference between input image data and the basic image data, before compression. Thereafter, the present invention takes the difference between the input image data and the basic

image data and compresses it to generate P data. Hence, the present invention is neither comparable nor analogous to the cited prior art.

To qualify as prior art under 35 U.S.C. §102, a single prior art reference must teach, i.e., identically describe, each feature of a rejected claim. As explained above, Ono fails to disclose or suggest each and every feature of pending Claims 1, 3, 4 and 6. Accordingly, Applicants respectfully submit that each of pending Claims 1, 3, 4 and 6 is not anticipated by nor rendered obvious by the disclosure of Ono. Therefore, Applicants respectfully submit that Claims 1, 3, 4 and 6 are allowable.

Furthermore, Applicants respectfully note Claims 2 and 5 depend from Claims 1 and 4, respectively. Therefore, it is respectfully submitted that Claims 2 and 5 are also allowable for at least the same reasons Claims 1 and 5 are allowable, as well as for the additional subject matter recited therein.

Accordingly, Applicants respectfully request withdrawal of the rejection.

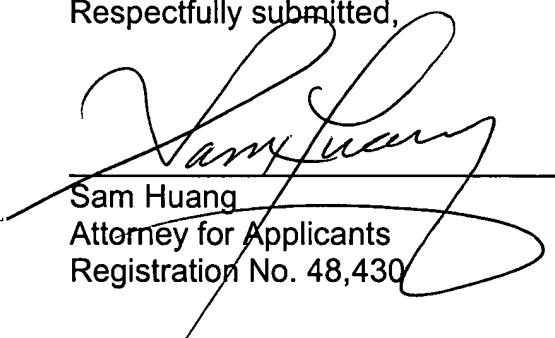
### Conclusion

In view of the above, Applicants respectfully submit that each of claims 1-6 recites subject matter that is neither disclosed nor suggested in the cited prior art. Applicants also submit that this subject matter is more than sufficient to render the claims non-obvious to a person of ordinary skill in the art, and therefore, respectfully request that claims 1-6 be found allowable and that this application be passed to issue.

If for any reason, the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper has not been timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing docket number 107314-00001.**

Respectfully submitted,

  
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